

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

V.

UNITED STATES OF AMERICA, *et al.*,

Defendants,

and

KARLA PEREZ, *et al.*,

Defendant-Intervenors.

Case No. 1:18-CV-68

**DEFENDANT-INTERVENORS' UNOPPOSED MOTION FOR LEAVE TO
EXCEED PAGE LIMITS ON THEIR BRIEF IN SUPPORT OF THEIR MOTION
FOR SUMMARY JUDGMENT AND IN OPPOSITION TO PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT**

Defendant-Intervenors Elizabeth Diaz, et al. (“Defendant-Intervenors”) respectfully request that the Court grant permission to exceed the 20-page briefing limit by 30 pages in their Brief in Support of Their Motion for Summary Judgment and in Opposition to Plaintiffs’ Motion for Summary Judgment (Defendant-Intervenors’ “Motion”). Defendant-Intervenors’ Motion raises complex issues in a case of national importance, and Defendant-Intervenors request these extra pages to adequately present these issues to the Court. Defendant-Intervenors seek this extension for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted. Plaintiffs moved to exceed the 20-page limit by 30 pages for their brief in support of their motion for summary judgment. *See* Dkt. 625. The other parties do not oppose Defendant-Intervenors’ request.

CONCLUSION

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant their Motion for Leave to Exceed Page Limits. A Proposed Order is submitted herewith.

Dated: March 2, 2023

Respectfully Submitted,

**MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND**

By: /s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046);

(SD of Tex. Bar No. 21127)

Attorney-in-Charge

110 Broadway, Suite 300

San Antonio, Texas 78205

Phone: (210) 224-5476

Facsimile: (210) 224-5382

Email: nperales@maldef.org

ROPES & GRAY LLP

Douglas H. Hallward-Driemeier

2099 Pennsylvania Ave NW

Washington, DC 20006-6807

(202) 508-4600

(201) 508-4776 (direct dial)

Douglas.Hallward-Driemeier@ropesgray.com

(Admitted pro hac vice)

**GARCÍA & GARCÍA,
ATTORNEYS AT LAW P.L.L.C.**

Carlos Moctezuma García

(Tex. Bar No. 24065265)

(SD of Tex. Bar No. 1081768)

P.O. Box 4545

McAllen, TX 78502

Phone: (956) 630-3889

Facsimile: (956) 630-3899

cgarcia@garciagarcialaw.com

Attorneys for Defendant-Intervenors

CERTIFICATE OF CONFERENCE

I certify that on January 30, 2023, and March 2, 2023, I conferred with counsel for Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor regarding the relief requested in this motion. The other parties do not oppose this motion.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on March 2, 2023, I electronically filed the above and foregoing document with the Clerk of the Court using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales

Attorney for Defendant-Intervenors